

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT CLEVELAND**

John Doe 1,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:22-cv-02139-PAB
)	
Varsity Brands, LLC; Varsity Spirit, LLC;)	JUDGE PAMELA A. BARKER
Varsity Brands Holding Company, Inc.; U.S.)	
All Star Federation, Inc. d/b/a U.S. All Star)	
Federation; USA Federation of Sport Cheering)	
d/b/a USA Cheer; Charlesbank Capital)	
Partners, LP; Bain Capital, LP; Jeff Webb,)	
individually; Taji Davis; Brandon Hale; and)	
ShowPro Choreography,)	
)	
Defendants.)	

PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE

Plaintiff John Doe gives notice of dismissal of this action, without prejudice, pursuant to Rule 41(a) of the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Abigail F. Chin

Charles H. Cooper, Jr. (0037295)

Rex H. Elliott (0054054)

Abigail F. Chin (0097928)

COOPER ELLIOTT

305 West Nationwide Boulevard

Columbus, Ohio 43215

(614) 481-6000

(614) 481-6001 (Facsimile)

chipc@cooperelliott.com

rexe@cooperelliott.com

abbyc@cooperelliott.com

Bakari T. Sellers, SC Fed. ID No. 11099*
Joseph Preston Strom, SC Fed. ID No. 4354*
Mario A. Pacella, SC Fed. ID No. 7538*
Amy E. Willbanks, SC Fed. ID No. 13537*
Jessica L. Fickling, SC Fed. ID No. 11403*
Alexandra Benevento, SC Fed. ID No. 10734*
STROM LAW FIRM
6923 N. Trenholm Road, Suite 200
Columbia, South Carolina 29206
(803) 252-4800
(803) 252-4801 (Facsimile)
bsellers@stromlaw.com
petestrom@stromlaw.com
mpacella@stromlaw.com
awillbanks@stromlaw.com
jfickling@stromlaw.com
abenevento@stromlaw.com

**Admitted Pro Hac Vice*

Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Notice of Dismissal was filed electronically and served electronically on the following counsel of record, this 6th day of December, 2024:

Michael T. Conway, Esq.
Michael T. Conway and Company
3456 Sandlewood Drive
Brunswick, Ohio 44212
Xray2Alpha@aol.com

Attorney for Defendant
Taji Davis

/s/ Abigail F. Chin